

Exhibit 3



Deposition of:
Patricia P. Petersen

September 26, 2019

In the Matter of:
**Panzarella Et Al Vs. Navient Solutions
Inc**

Veritext Legal Solutions
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

ELIZABETH PANZARELLA and)
JOSHUA PANZARELLA,)
individually and on)
behalf of all others)
similarly situated)
)
Plaintiffs)
)
v.) 2:18-cv-03735-PBT
)
NAVIENT SOLUTIONS,)
LLC)
)
Defendant)

A deposition of PATRICIA P. PETERSON was taken pursuant to notice before Carrie Gold, Court Reporter, in the law offices of Greenberg Traurig, LLP, 1007 North Orange Street, Suite 1200, Wilmington, Delaware, on Thursday, September 26, 2019, beginning at approximately 1:02 p.m., there being present:

VERITEXT NATIONAL COURT REPORTING COMPANY
MID-ATLANTIC REGION
300 Delaware Avenue, Suite 815
Wilmington, DE 19801
302-571-0510

1 APPEARANCES:

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For the Defendant

18
19 ALSO PRESENT:

20 Matthew Sheldon, Navient Vice President
and Associate General Counsel

21 Adam Carson, Videographer
22
23
24
25

I N D E X

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(No exhibits marked.)

1 THE VIDEOGRAPHER: Good afternoon.

2 We're going on the record at 1:02 p.m. on September 26,
3 2019. Please note that the microphones are sensitive and
4 may pick up private conversations, whispering, and
5 cellular interference. Please turn off all cell phones
6 or place them away from the microphones as they can
7 interfere with the deposition audio.

8 This is media unit 1 of the
9 video-recorded deposition of Patricia Peterson in the
10 matter of Elizabeth Panzarella, et al, versus Navient
11 Solutions, LLC, filed in the United States District Court
12 Eastern District of Pennsylvania, case number
13 2:18-cv-037 -- 735-PBT.

14 This deposition is being held at
15 Greenberg Traurig located at 1007 North Orange Street,
16 Suite 1200, in Wilmington, Delaware. My name is Adam
17 Carson from the firm Veritext Legal Solutions and I am
18 the videographer. The court reporter is Carrie Gold from
19 the firm Veritext Legal Solutions.

20 Counsel present in the room will now
21 state their appearances and affiliations for the record.

22 MR. FRANCIS: This is Jim Francis from
23 Francis, Mailman & Soumilas on behalf of the plaintiffs,
24 and with me is my cocounsel Robert Cocco. And I'll make

1 the same correction on the record that this is not only a
2 deposition of Ms. Peterson herself in her individual
3 capacity. Ms. Peterson is also appearing here today as a
4 corporate representative of the defendant Navient to
5 testify on behalf of -- of various topics that were
6 communicated in connection with a Rule 30(b)(6) notice.

7 MS. SIMONETTI: Okay. I'm Lisa
8 Simonetti for defendant.

9 THE VIDEOGRAPHER: Will the court
10 reporter please swear the witness?

11 - - - - -

12 PATRICIA P. PETERSON, having first been duly
13 sworn according to law, was examined and testified as
14 follows:

15 EXAMINATION

16 BY MR. FRANCIS:

17 Q. Ms. Peterson, good afternoon. We just met.
18 My name is Jim Francis and I'm one of the attorneys who
19 represents the plaintiffs in this case that's been
20 brought against Navient. You just heard me make a
21 statement that you are appearing today both in connection
22 with your individual testimony as a fact witness, as well
23 as a corporate representative on behalf of Navient. Are
24 you aware of that?

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1 have this inaccurate alternative number attribution?

2 MS. SIMONETTI: Can you read that back?

3 (The reporter read from the record as
4 requested.)

5 MS. SIMONETTI: I just object to the use
6 of the word "inaccurate." We don't know that it's
7 inaccurate. That's your position, but go ahead. Go
8 ahead.

9 THE WITNESS: I -- I can make some
10 assumptions based on what I know would be a case where
11 the account -- or the people would be on there. Just
12 back on the references, we do have, as a part of our
13 practice, to try and find the customer's phone number to
14 reach a reference. So, in this case, they would have
15 been -- or in the cases that we're talking about, they
16 would have not had the association to the borrower or be
17 a potential borrower phone number. They would have only
18 been listed as a reference.

19 BY MR. FRANCIS:

20 Q. Okay. And they would be -- have been called
21 as a reference to locate the borrower, correct?

22 A. More -- that -- that's the assumption, yes.

23 Q. Okay. And I think you said before, since
24 Baker, Navient has not changed that practice, correct?

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1 It still calls references in connection with attempting
2 to locate debtors.

3 A. Correct. We -- we have to in the case of our
4 federal student loans.

5 Q. Okay. And then in the case of nonfederal
6 student loans, but you -- it still does that, correct?

7 A. Yes.

8 Q. Okay. All right.

9 MR. FRANCIS: Off the video. We'll just
10 take a short break.

11 THE VIDEOGRAPHER: The time is now 2:25.
12 We're going off the video record --

13 MS. SIMONETTI: Do you want us to step
14 out.

15 THE VIDEOGRAPHER: -- ending media unit
16 number 1.

17 (Brief recess.)

18 THE VIDEOGRAPHER: The time is now 2:43.
19 We're back on the video record beginning video unit
20 number 2.

21 BY MR. FRANCIS:

22 Q. Ms. Peterson, before we took a break, I was
23 asking you some questions about how and when and the
24 circumstances surrounding the association of -- of the

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C E R T I F I C A T E

I do hereby certify that I am a Notary Public in good standing, that the aforesaid testimony was taken before me, pursuant to notice, at the time and place indicated; that said deponent was by me duly sworn to tell the truth, the whole truth, and nothing but the truth; that the testimony of said deponent was correctly recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided transcription; that the deposition is a true and correct record of the testimony given by the witness; and that I am neither of counsel nor kin to any party in said action, nor interested in the outcome thereof.

WITNESS my hand this 10th day of October, 2019.



Notary Public

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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